

R E M A R K S

- Claims 1-28 are pending in this application
- Claims 1-4 (Group 1) were elected in a prior response
- Claim 1 has been amended herein
- Claim 1 is the only independent claim being examined

A. Rejection of Claims 1-3 under 35 U.S.C. 102(e)

Claims 1 to 3 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 7,001,641 filed September 23, 2002 and issued February 21, 2006 to Valery M. Dubin et al. (hereinafter "*Dubin*"). Applicants have herein amended claim 1 to clarify that the "agitated rinse" includes "applying sonic energy to a rinse liquid applied to the metal seed layer." Applicants respectfully submit that *Dubin* neither discloses nor suggests this feature of amended claim 1. Rather, *Dubin* describes in Col. 5, ln 63 to Col. 6, ln. 6, cited in the Office Action, a washing liquid may be provided at a rate of between about 0.2 liters/minute and about 2 liters/minute to wash away any deteriorated organic material from the surface of the seed layer. Claim 1 as amended, on the other hand, defines "agitated rinse" to include "applying sonic energy to a rinse liquid applied to the metal seed layer." Support for this amendment may be found, for example, page 4, lns. 4-12 of the Applicants' specification: agitated rinse includes:

exposing an object to a liquid while (1) spraying the liquid on the object with a nozzle, a jet and/or a similar device that increases the speed and/or pressure of the liquid; (2) rotating and/or vibrating and/or otherwise agitating the object; and/or (3) applying megasonic and/or ultrasonic energy and/or other agitation to the liquid. Such agitated rinsing may, for example, break

adhesive forces between contaminants and a substrate.

Dubin fails to provide any disclosure or suggestion of rotating and/or vibrating and/or otherwise agitating the object, and/or applying megasonic and/or ultrasonic energy and/or other agitation to the liquid, as described in Applicants' specification. Thus, *Dubin* does not disclose at least this element of claim 1 as amended. As such, Applicants respectfully submit that claim 1 as amended is patentable over *Dubin*, and request that the rejection be withdrawn. Likewise, claims 2 and 3, which depend from claim 1, are asserted to be patentable for at least the same reasons.

B. Rejection of Claim 4 under 35 U.S.C. 103(a)

Claim 4 stands rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 7,001,641 filed September 23, 2002 and issued February 21, 2006 to *Valery M. Dubin et al.* (hereinafter "*Dubin*") and further in view of U.S. Patent No. 6,423,200 B1 filed September 30, 1999 and issued July 23, 2002 to *Diane J. Hymes* (hereinafter "*Hymes*").

As detailed above, *Dubin* does not disclose or even suggest all the features recited in claim 1 as amended, the base claim from which claim 4 depends. In addition, *Hymes* does not overcome the previously noted shortcomings of *Dubin*. Therefore, claim 4 is not obvious over the cited references and the Applicants respectfully request that the rejection be withdrawn.

C. Conclusion

Applicants believe the claims are now in condition for allowance, and respectfully request reconsideration and allowance of the same. Applicants do not believe any additional

fees are due regarding this Amendment. However, if any additional fees are required, please charge Deposit Account No. 04-1696.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steven M. Santisi". The signature is fluid and cursive, with the first name "Steven" and last name "Santisi" being more legible than the middle initial "M.".

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